



SCHOOL BOARD OF POLK COUNTY

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September 12, 2013

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KATHRYN M. LEROY
Superintendent

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir/Madam:

On behalf of the Polk County School Board, I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate Program. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate Program. The E-Rate Program provides critical discounts to assist schools (like ours) to obtain affordable telecommunications and Internet access.

The Polk County School District is the eighth largest in Florida and thirty-first largest in the United States. Polk County has 163 school sites and centers including 66 elementary, 4 elementary/middle, 7 elementary/middle/high, 18 middle, 3 middle/high, 18 high, 2 technical career centers, 2 adult, 11 alternative education, 24 charters, 5 Department of Juvenile Justice sites, and 3 off-campus Head Start sites. More than 95,000 students are enrolled, with a diverse student body.

While we support E-Rate's efforts to provide students with access to robust digital learning and education technology; we realize the need to shift from merely establishing connectivity to expanding connectivity. Mobile devices (e.g., smart phones, handhelds, mobile PCs, etc.) enable students to download their textbooks onto them to be accessed both during school hours as well as beyond the school day. Students should be able to learn anytime/anywhere; therefore, we strongly encourage E-Rate funding for wireless Internet access services for mobile learning devices that are used beyond school premises as well as provide funding for related professional development.

Furthermore, we strongly support calculating discount rates at the school district level rather than using the weighted average for each school building. Additionally, we strongly oppose this change, as it would adversely affect low-income schools in large or county-wide school districts by lowering their discount rate percentages while wealthy schools in the same districts would benefit from an increase in their discount rates. We encourage the Commission to maintain the current practice of assessing poverty on a school-by-school basis. This will help ensure that E-Rate discounts are targeted to the right school populations without penalizing school districts based on size or whether their state organizes them contiguous to county borders.

Finally, the E-Rate Program has succeeded in its mission; therefore, we believe the single most effective step the FCC can take to bolster E-Rate's current and future success is to provide \$5 billion in funding, an amount proportionate to the current E-Rate funding demand.

Thank you for considering our response as you move forward with your decision on the E-Rate Program and we urge you to support significant increased funding for the E-Rate Program.

Sincerely,

A handwritten signature in dark ink, appearing to read "Hazel Sellers", written over a horizontal line.

Hazel Sellers
Board Chair
Polk County School District

HS/pm

cc: School Board Members
Superintendent Kathryn LeRoy
Assistant Superintendent Abdu Taguri